

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
W.R. GRACE & CO., et al.,)
Debtors.) Case No. 01-1139 (JKF)
) Jointly Administered
) Re: Docket No. 8466

DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF THEIR ELEVENTH OMNIBUS OBJECTION TO CLAIMS (NON-ASBESTOS GATEWAY)

The Debtors hereby request authority pursuant to Del. Bankr. L.R. 9006-1(d) to file a reply in further support of the Debtors' Eleventh Omnibus Objection to Claims (Non-Asbestos Gateway) (Docket No. 8466) (the "11th Omnibus Objection"), which is currently scheduled for hearing before this Court on September 26, 2005 at 12:00 p.m.

The Debtors seek leave to file a reply regarding the claim filed against the Debtors by Mark C. Barnett, claim no. 2107. Mr. Barnett has not filed any reply or response with the Court, but has simply responded to Debtors' counsel with handwritten notes on the notice regarding the objection to his claim. The Debtors request leave to address the legal standards in connection with Mr. Barnett's claim.

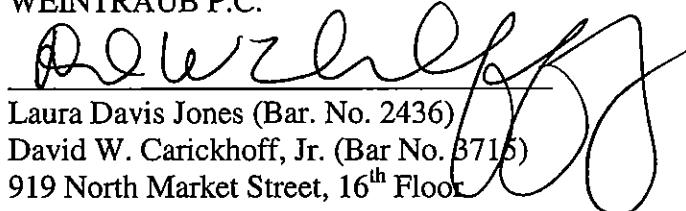
WHEREFORE, the Debtors respectfully request entry of an Order granting them authority to file the reply, which is attached hereto as Exhibit 1.

Dated: September 9, 2005

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Co-Counsel for the Debtors and Debtors in Possession

SO ORDERED this ____ day
of September, 2005

The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge